



AUG 20 2014

Mr. Robert Beebout
Aera Energy LLC
P O Box 11164
Bakersfield, CA 93389

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1135
Project # S-1142127**

Dear Mr. Beebout:

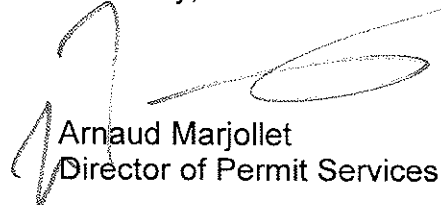
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit(s) to Operate (PTOs) S-1135-3-23 and '-29-29 of the facility's current Title V operating permit. The current Permits to Operate (PTOs) were revised to list the burners as exempt and remove all conditions associated with the burners.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-1135-3-24 and '-29-30, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1142127

Engineer: Tim Bush
Date: August 12, 2014

Facility Number: S-1135
Facility Name: Aera Energy LLC
Mailing Address: P O Box 11164
Bakersfield, CA 93389

Contact Name: Robert Beebout
Phone: (661) 665-3212

Responsible Official: A.E (Anthony) Gurrola
Title: Process Supervisor

I. PROPOSAL

Aera Energy LLC (Aera) is proposing a Title V minor permit modification to designate the burners associated with heater treaters S-1135-3-23 and '-29 as permit exempt (PEER project S-1141299). The burners are rated 5.0 MMBtu/hr or less and are fired on natural gas and meet the requirements of District Rule 2020 Section 6.1.1. The current Permits to Operate (PTOs) were revised to list the burners as exempt and remove all conditions associated with the burners.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

Heavy Oil Western Stationary Source
at Metson Lease

III. EQUIPMENT DESCRIPTION

S-1135-3-24: HEATER TREATER #1 SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1135-70, AND PERMIT EXEMPT BURNER (NATURAL GAS-FIRED, 5.0 MMBTU/HR OR LESS) (METSON LEASE)

S-1135-29-30: HEATER TREATER (#2) SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1135-70 AND PERMIT EXEMPT BURNER (NATURAL GAS-FIRED, 5.0 MMBTU/HR OR LESS) (METSON LEASE)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

AERA is proposing to designate the burners associated with heater treaters S-1135-3 and '-29 as permit exempt.

The burners are rated 5.0 MMBtu/hr or less and are fired on natural gas that meets the requirements of District Rule 2020 Section 6.1.1. The current Permits to Operate (PTOs) were revised to list the burners as exempt and remove all conditions associated with the burners. The description of the modifications to the permit conditions are specified below:

S-1135-3 and '-29:

Conditions related to the burners and the fuel for the burners were deleted.

S-1135-3 and '-29:

Permit conditions 2 through 10 were added to the proposed Permit to Operate. These conditions specify the required maintenance for the heater treater.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-1135-3-24 and '-29-30
- B. Emissions Increases
- C. Application
- D. Previous Title V Operating Permit No.'s S-1135-3-23 and '-29-29

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(S-1135-3-24 and '-29-30)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-3-24

EXPIRATION DATE: 03/31/2016

SECTION: 24 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

HEATER TREATER #1 SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1135-70, AND PERMIT EXEMPT BURNER (NATURAL GAS-FIRED, 5.0 MMBTU/HR OR LESS) (METSON LEASE)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Heater treater and appurtenances shall be maintained leak-free (as defined in Rule 4623) except during periods of unit maintenance or cleaning, vapor control system maintenance, and power curtailment. [District Rule 2520] Federally Enforceable Through Title V Permit
3. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520] Federally Enforceable Through Title V Permit
4. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520] Federally Enforceable Through Title V Permit
5. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520] Federally Enforceable Through Title V Permit
6. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA

S-1135-3-24 - Aug 15 2014 8:38AM - BUSH7

8. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520] Federally Enforceable Through Title V Permit
9. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-29-30

EXPIRATION DATE: 05/31/2016

SECTION: 24 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

HEATER TREATER (#2) SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1135-70 AND PERMIT EXEMPT BURNER (NATURAL GAS-FIRED, 5.0 MMBTU/HR OR LESS) (METSON LEASE)

PERMIT UNIT REQUIREMENTS

1. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Heater treater and appurtenances shall be maintained leak-free (as defined in Rule 4623) except during periods of unit maintenance or cleaning, vapor control system maintenance, and power curtailment. [District Rule 2520] Federally Enforceable Through Title V Permit
3. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520] Federally Enforceable Through Title V Permit
4. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520] Federally Enforceable Through Title V Permit
5. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520] Federally Enforceable Through Title V Permit
6. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

8. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520] Federally Enforceable Through Title V Permit
9. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1135-3-24	0	0	0	0	0
S-1135-29-30	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT C

Application



March 19, 2014

Mr. Leonard Scandura
Regional Manager, Permit Services
San Joaquin Valley
Air Pollution Control District
34946 Flyover Court
Bakersfield, CA 93308

RECEIVED
MAR 19 2014
SJVAPCD
Southern Region

Subject: Application for Permit-Exempt Equipment Registration and Authority(s) to Construct
Midway Sunset heater treaters (PTO's S-1135-3 & '-29)

Dear Mr. Scandura:

Aera Energy LLC (Aera) operates two (2) fired heater treater vessels at its Metson dehydration facility. The burners on all of these heater treaters vessels are rated ≤ 5.0 mmBTU/hr.

Lease	APCD Permit Number	Equipment ID	Size
Metson	S-1135-0003	HT #110	5.0 mmBTU/Hr.
Metson	S-1135-0029	HT #120	4.2 mmBTU/Hr.

Aera is requesting to convert each of the burners on the permitted fired heater treater vessels to Permit-Exempt Equipment Registrations (PEER), and to identify those burners on the heater treater vessel PTO's as permit-exempt.

Your assistance in issuing the requested PEER's and Authority(s) to Construct (ATC's) in an expeditious manner would be greatly appreciated.

Should you have any questions concerning this application or require additional information, please do not hesitate to contact me at (661) 665-3212 or via e-mail at rmbeebout@aeraenergy.com.

Sincerely,

Robert M. Beebout
Environmental Advisor – Midway Sunset

Enclosure



San Joaquin Valley Air Pollution Control District

www.valleyair.org



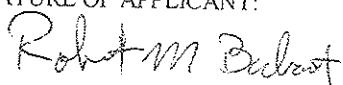
MAR 19 2014



Permit Application For:

- [] AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit
 [X] AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC
 [] AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct
 [] PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate

SJVAPCD
Southern Region

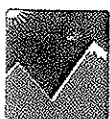
1. PERMIT TO BE ISSUED TO: Aera Energy LLC		
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. Box 11164 CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93389-1164		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Midway Sunset 29235 Hwy 33 CITY: Maricopa SW 74 SECTION 24 TOWNSHIP 11N RANGE 23W		WITHIN 1,000 FT OF A SCHOOL? [] YES [X] NO
4. GENERAL NATURE OF BUSINESS: Oil Production		S.I.C. CODE(S) OF FACILITY (If known): 1311
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC [X] YES If yes, please complete and attach a Compliance Certification form (TVFORM-009)? [] NO		
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (Please include Permit #'s if known, and use additional sheets if necessary) Modify PTO for Metson Heater Treater HT #110 (S-1135-3) to identify the burner as "permit-exempt" in the equipment description and remove all burner-related Permit Unit Requirements EQUIPMENT INSTALLATION or MODIFICATION DATE: current burner installed about June 2006		
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? [] 3-day review Please note that requesting a review period will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. [X] 10-day review [] No review requested		
8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? [X] YES If yes, ATC/PTO #: [] NO		Optional Section 11. DO YOU WANT TO RECEIVE INFORMATION ABOUT EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS? [] "HEALTHY AIR LIVING (HAL) BUSINESS PARTNER" [] "INSPECT"  
9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? [] YES If "Yes", please complete the CEQA Information form. [X] NO If "No", is the proposed equipment or project allowed: - by the current Conditional Use Permit or other Land Use Permit? [] YES [] NO - or by Right? [] YES [] NO		
10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? [] YES If yes, NOV/NTC #: [X] NO		
12. TYPE OR PRINT NAME OF APPLICANT: Robert M. Beebout		TITLE OF APPLICANT: Environmental Advisor
13. SIGNATURE OF APPLICANT:  DATE: 3/18/2014		PHONE #: 661-665-3212 CELL PHONE #: 661-201-7304 FAX #: 661-665-3222 E-MAIL: rmbeebout@aeraenergy.com

FOR APCD USE ONLY:

DATE STAMP: RECEIVED MAR 19 2014 SJVAPCD Southern Region	FILING FEE RECEIVED: \$ 9231 DATE PAID: PM 3/19/2014 PROJECT #: S-1141300	CHECK #: 492457 FACILITY ID: S-1135
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Northern Regional Office * 4800 Enterprise Way * Modesto, California 95356-8718 * (209) 557-6400 * FAX (209) 557-6475
 Central Regional Office * 1990 East Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061
 Southern Regional Office * 34946 Flyover Court * Bakersfield, California 93308 * (661) 392-5500 * FAX (661) 392-5585

Revised: August 2013



San Joaquin Valley Air Pollution Control District

www.valleyair.org



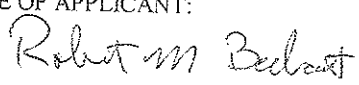
MAR 19 2014



Permit Application For:

- ☐ AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit
☒ AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC
☐ AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct
☐ PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate

SJVAPCD
Southern Region

1. PERMIT TO BE ISSUED TO: Aera Energy LLC		
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. Box 11164 CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93389-1164		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Midway Sunset 29235 Hwy 33 CITY: Maricopa SW 74 SECTION 24 TOWNSHIP 11N RANGE 23W		WITHIN 1,000 FT OF A SCHOOL: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. GENERAL NATURE OF BUSINESS: Oil Production		S.I.C. CODE(S) OF FACILITY (If known): 1311
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC <input checked="" type="checkbox"/> YES If yes, please complete and attach a Compliance Certification form (TVFORM-009)? <input type="checkbox"/> NO		
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (Please include Permit #'s if known, and use additional sheets if necessary) Modify PTO for Metson Heater Treater HT #120 (S-1135-29) to identify the burner as "permit-exempt" in the equipment description and remove all burner-related Permit Unit Requirements EQUIPMENT INSTALLATION or MODIFICATION DATE: current burner installed about June 2006		
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? <input type="checkbox"/> 3-day review Please note that requesting a review period will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. <input checked="" type="checkbox"/> 10-day review <input type="checkbox"/> No review requested		
8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES If yes, ATC/PTO #: _____ <input type="checkbox"/> NO		Optional Section 11. DO YOU WANT TO RECEIVE INFORMATION ABOUT EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS? <input type="checkbox"/> "HEALTHY AIR LIVING (HAL) BUSINESS PARTNER" <input type="checkbox"/> "INSPECT"  
9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? <input type="checkbox"/> YES If "Yes", please complete the CEQA Information form. <input checked="" type="checkbox"/> NO If "No", is the proposed equipment or project allowed: - by the current Conditional Use Permit or other Land Use Permit? <input type="checkbox"/> YES <input type="checkbox"/> NO - or by Right? <input type="checkbox"/> YES <input type="checkbox"/> NO		
10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES If yes, NOV/NTC #: _____ <input checked="" type="checkbox"/> NO		
12. TYPE OR PRINT NAME OF APPLICANT: Robert M. Beebout		TITLE OF APPLICANT: Environmental Advisor
13. SIGNATURE OF APPLICANT: 		DATE: 3/18/2014
		PHONE #: 661-665-3212 CELL PHONE #: 661-201-7304 FAX #: 661-665-3222 E-MAIL: rmbeebout@aeraenergy.com

FOR APCD USE ONLY RECEIVED

DATE STAMP: MAR 19 2014 SJVAPCD Southern Region	FILING FEE RECEIVED: \$ _____ CHECK #: _____ DATE PAID: _____ PROJECT #: _____ FACILITY ID: _____
--	--

**San Joaquin Valley
Unified Air Pollution Control District**

RECEIVED

MAR 19 2014

SJVAPCD
Southern Region

TITLE V COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION ☐ AMENDMENT

COMPANY NAME: Aera Energy LLC		FACILITY ID: S-1135
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility		
2. Owner's Name: Aera Energy LLC		
3. Agent to the Owner: N/A		

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the emission units identified in this application will continue to comply with the applicable federal requirement(s) which the emission units are in compliance.
- ☒ Based on information and belief formed after reasonable inquiry, the emission units identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Anthony Gurrola
Signature of Responsible Official

3/19/14
Date

A.E. (Anthony) Gurrola
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit No.'s S-
1135-3-23 and '-29-29

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-3-23

EXPIRATION DATE: 05/31/2016

SECTION: 24 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

8.4 MMBTU/HR (DERATED TO 5 MMBTU/HR) NATURAL GAS FIRED HEATER TREATER #1 WITH A MAXON MODEL M-PAKT BURNER WITH VARIABLE FREQUENCY DRIVE (VFD) BLOWER, SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1135-70 - METSON LEASE

PERMIT UNIT REQUIREMENTS

1. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2; District Rule 4301, 5.2.1; District Rule 4801, 3.1; and Kern County Rule 407] Federally Enforceable Through Title V Permit
6. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6 or CARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory and EPA Method 19 to calculated emissions. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 2520, 9.3.2 and 4305, 6.2.1] Federally Enforceable Through Title V Permit
11. Fuel gas sulfur content shall not exceed 0.5 gr/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera), 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
14. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
15. The rated heat input of the unit shall be reduced to no greater than 5.0 MMBtu/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Fuel consumption shall be verified by the use of a non-resettable, totalizing mass or volumetric flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Emission rates, except during startup and shutdown shall not exceed the following: PM₁₀: 0.0076 lb/MMBtu, SO_x (as SO₂): 0.00285 lb/MMBtu, NO_x (as NO₂): 0.036 lb/MMBtu or 30 ppmv @ 3% O₂, VOC: 0.0055 lb/MMBtu, and CO: 0.033 lb/MMBtu or 45 ppmv @ 3% O₂. [District NSR Rule, District Rule 4301, District Rule 4201, District Rule 4307, and Kern County Rule 404] Federally Enforceable Through Title V Permit
18. Emission rates shall not exceed any of the following: NO_x (as NO₂): 4.3 lb/day, SO_x (as SO₂): 0.3 lb/day, PM₁₀: 0.9 lb/day, CO: 4.0 lb/day, VOC: 0.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of fuel type and quantity for each day of operation, in the format approved by the District. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The duration of start-up and shutdown shall not exceed one hour each per occurrence. [District Rule 4307] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the duration of each start-up and shutdown that exceed one hour per occurrence for a period of five years and make such records readily available for District inspection upon request. [District Rule 4307] Federally Enforceable Through Title V Permit
22. The permittee shall monitor, at least once per month, the units's operational characteristics recommended by the manufacturer and approved by the APCO. [District Rule 4307] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. The permittee shall tune the unit at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year. The unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. In lieu of tuning the unit twice each calendar year, the owner/operator shall monitor the emissions with a portable NOx analyzer at least twice per calendar year and adjust the unit's operating parameters accordingly to assure compliance with the emission limits of this rule. [District Rule 4307] Federally Enforceable Through Title V Permit
24. If the unit is tuned for compliance, the permittee shall maintain records of: (1) the date that tune-ups are performed, (2) a description of any corrective action taken to maintain the emissions within the acceptable range, and (3) a record of the operational characteristics monitored. [District Rule 4307] Federally Enforceable Through Title V Permit
25. If NOx emissions are monitored for compliance, the permittee shall maintain records of: (1) the date and time of the NOx measurements, (2) the O2 concentration in percent and the measured NOx concentration corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) a description of any corrective action taken to maintain the emissions within the acceptable range, and (6) a record of the operational characteristics monitored. [District Rules 4307] Federally Enforceable Through Title V Permit
26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4307. Notwithstanding the requirements above and per Section 5.5.4 of Rule 4307, for units with a cyclical firing period that routinely interrupts fuel flow as part of its normal operation, source testing may commence sooner than specified above and continue through its normal cyclical firing period. [District Rule 4307] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4307] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1135-29-29

EXPIRATION DATE: 05/31/2016

SECTION: 24 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

NATURAL GAS-FIRED HEATER TREATER (#2) WITH A 4.2 MMBTU/HR MAXON MODEL M-PAKT BURNER SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1135-70 - METSON LEASE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Methods 6, 6B, 8 or CARB Method 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D 3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated emissions. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Fuel gas sulfur content shall not exceed 0.5 gr/100 scf (as sulfur). [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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Facility Name: AERA ENERGY LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, MIDWAY-SUNSET, KERN COUNTY, CA

S-1135-29-29 : Aug 14 2014 5:01PM -- BUSH

10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera), 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
12. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. Use of an alternate system consisting of calibrated orifice plates, transmitters, and a programmable logic controller (PLC) may be used to meet this requirement. [District Rules 2201] Federally Enforceable Through Title V Permit
15. Records of monthly and annual heat input of the unit shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emission rates, except during startup and shutdown shall not exceed any of the following: PM10: 0.136 lb/MMBtu, SOx (as SO2): 0.005 lb/MMBtu, VOC: 0.007 lb/MMBtu, NOx (as NO2): 0.036 lb/MMBtu or 30 ppmv @ 3% O2, or CO: 0.037 lb/MMBtu or 50 ppmv @ 3% O2. [District Rules 2201, 2520, 4201, 4301, 4307, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
17. Emission rates during startup and shutdown shall not exceed any of the following: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan ; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed 0.1 grain/dscf, calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
19. Emission rates shall not exceed any of the following: PM10: 13.7 lb/day, SOx (as SO2): 0.5 lb/day, VOC: 0.7 lb/day, NOx (as NO2): 80.2 lb/day or 1080 lb/yr, or CO: 3.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Duration of start-up and shutdown shall not exceed one hour each per occurrence. [District Rule 4307] Federally Enforceable Through Title V Permit
21. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
22. Permittee shall maintain records of duration of each start-up and shutdown that exceed one hour per occurrence, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4307] Federally Enforceable Through Title V Permit
23. The permittee shall monitor, at least once per month, the units's operational characteristics recommended by the manufacturer and approved by the APCO. [District Rule 4307] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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24. The permittee shall tune the unit at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year. The unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. In lieu of tuning the unit twice each calendar year, the owner/operator shall monitor the emissions with a portable NOx analyzer at least twice per calendar year and adjust the unit's operating parameters accordingly to assure compliance with the emission limits of this rule. [District Rule 4307] Federally Enforceable Through Title V Permit
25. If the unit is tuned for compliance, the permittee shall maintain records of: (1) the date that tune-ups are performed, (2) a description of any corrective action taken to maintain the emissions within the acceptable range, and (3) a record of the operational characteristics monitored. [District Rule 4307] Federally Enforceable Through Title V Permit
26. If NOx emissions are monitored for compliance, the permittee shall maintain records of: (1) the date and time of the NOx measurements, (2) the O2 concentration in percent and the measured NOx concentration corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, (5) a description of any corrective action taken to maintain the emissions within the acceptable range, and (6) a record of the operational characteristics monitored. [District Rule 4307] Federally Enforceable Through Title V Permit
27. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4307. Notwithstanding the requirements above and per Section 5.5.4 of Rule 4307, for units with a cyclical firing period that routinely interrupts fuel flow as part of its normal operation, source testing may commence sooner than specified above and continue through its normal cyclical firing period. [District Rule 4307] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.